

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF
AMERICA CORP.,

Defendants.

Civil Action No. 2:21-CV-00310-JRG
(Lead Case)

Civil Action No. 2:21-CV-00309-JRG
(Member Case)

NOKIA OF AMERICA CORP.,

Third-Party Plaintiff,

v.

BROADCOM CORP., BROADCOM INC.,
and AVAGO TECHNOLOGIES
INTERNATIONAL SALES PTE. LTD.,

Third-Party Defendants.

CORPORATE DISCLOSURE STATEMENT PURSUANT TO FED. R. CIV. P. 7.1

Pursuant to Federal Rule of Civil Procedure 7.1, Third-Party Defendants Broadcom Corp., Broadcom Inc., and Avago Technologies International Sales Pte. Ltd. (collectively, "Broadcom"), by and through their undersigned counsel, hereby state the following:

Broadcom Corporation is a wholly-owned subsidiary of BC Luxembourg S.à.r.l., which is a wholly-owned subsidiary of Broadcom Cayman Finance Ltd., which is a wholly-owned subsidiary of Avago Technologies Cayman Holdings Ltd., which is a wholly-owned subsidiary of Broadcom Pte. Ltd., which is a wholly-owned subsidiary of Broadcom Technologies Inc., which is a wholly-owned subsidiary of Broadcom Inc.

Avago Technologies International Sales Pte. Limited is a corporation incorporated under the laws of the Republic of Singapore, and is a wholly-owned subsidiary of Broadcom Inc.

Broadcom Inc. is a publicly owned company, and, to its knowledge, no publicly-held corporation owns more than 10% of Broadcom Inc.'s stock.

Dated: April 14, 2022

Respectfully submitted:

GILLAM & SMITH, LLP

/s/ Melissa R. Smith

Melissa Richards Smith
State Bar No. 24001351
303 S. Washington Ave.
Marshall, TX 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

*Counsel for Third-Party Defendants BROADCOM
CORP., BROADCOM INC., AND AVAGO
TECHNOLOGIES INTERNATIONAL SALES PTE.
LTD.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 14, 2022, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3):

/s/ *Melissa R. Smith*

Melissa R. Smith